

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	)
	)
Plaintiff,	)
- v. -	) <b>12 Civ. 2600 (GBD)</b>
	)
A 10th CENTURY CAMBODIAN SANDSTONE	)
SCULPTURE, CURRENTLY LOCATED AT	)
SOTHEBY'S IN NEW YORK, NEW YORK,	)
	)
Defendant in rem.	
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**DECLARATION OF PETER G. NEIMAN**  
**IN SUPPORT OF CLAIMANTS' MOTION TO DISMISS**

Peter G. Neiman, pursuant to 28 U.S.C. 1746, declares as follows:

1. I am a partner in the law firm Wilmer Cutler Pickering Hale and Dorr LLP. I respectfully submit this declaration in support of the Memorandum of Law in Support of Claimants' Motion to Dismiss.

2. Attached as exhibits are true and correct copies of the following documents:

**Exhibit 1:** Email from Emma Bunker to Anu Ghosh-Mazumdar (June 29, 2010), referenced in paragraphs 24 and 26 of the Complaint.

**Exhibit 2:** Email from Anu Ghosh-Mazumdar to herself (August 9, 2010), referenced in paragraphs 27, 28, and 29 of the Complaint.

**Exhibit 3:** Email from Anu Ghosh-Mazumdar to Hab Touch (November 8, 2010), referenced in paragraph 31 and 32 of the Complaint.

**Exhibit 4:** Letter from Tan Theany to Sotheby's (March 24, 2010) referenced in paragraph 33 of the Complaint.

**Exhibit 5:** Excerpt from *Angkor: Heart of an Empire*, by Bruno Dagens (1989).

**Exhibit 6:** Excerpt from 1939 survey of Koh Ker by Henri Parmentier of the EFEO, referenced in paragraph 15(a) of the Complaint, along with an English translation thereof prepared by a translation service.

**Exhibit 7:** Receipt for sale of a “sandstone Guardian figure” (December 30, 1975), referenced in paragraph 21 of the Complaint.

**Exhibit 8:** Order of the Governor General of Indochina on preservation of monuments and objects of historical or artistic interest (March 9, 1900), referenced in paragraph 37 of the Complaint, along with an English translation thereof prepared by a translation service.

**Exhibit 9:** Report to the President of the French Republic (December 23, 1924), obtained from the database on cultural property laws maintained by UNESCO, along with an English translation thereof prepared by a translation service.

**Exhibit 10:** Abstract and Delimitation of the Law Respecting The Classification, Conservation, and Protection of Historical Monuments, referenced in paragraph 38 of the Complaint.

**Exhibit 11:** Photographs allegedly taken at Koh Ker in the 1950s and 1960s, produced by the Government in response to a discovery request in this action seeking “the photographs that allegedly depict Koh Ker and Prasat Chen in the 1950s and 1960s referenced in paragraph 15.b of the Complaint.”

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed in New York, New York on June 5, 2012.



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Peter G. Neiman